

February 10, 2017

VIA ECF

Honorable Ronald L. Ellis
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: ***Masi v. Vox Media, Inc. (1:16-cv-8484-ALC)***

Dear Judge Ellis,

The parties jointly submit this letter in accordance with Honor's direction at the initial conference in the above-referenced action. The parties will be putting together their first request for production of documents according to the deadlines outlines in the case management plan below. The parties have informally conferred on discovery items and have limited the topics for the potential discovery in this action. At this time, the parties do not have any discovery disputes. The parties are continuing to engage in good faith settlement discussions throughout this process. We will let the Court know if the parties do have any issues regarding discovery once formal demands are issued.

Initial Disclosures to be served by Feb. 20, 2017
First Request for Production of Documents to be served by March 6, 2017
First Set of Interrogatories to be served by March 6, 2017
Depositions due by May 31, 2017
End of Fact Discovery- June 6, 2017
Plaintiff's Expert Disclosures to be served by July 6, 2017
Defendant's Expert Disclosures to be served by August 7, 2017
Close of Expert Discovery- September 6, 2017

Sincerely,

| /s/Richard Liebowitz
Richard P. Liebowitz
Liebowitz Law Firm, PLLC
11 Sunrise Plaza, Suite 305
Valley Stream, New York 11580
Tele: 516-233-1660
RL@LiebowitzLawFirm.com

/s/Rachel Strom
Rachel F. Strom
Levine Sullivan Koch & Schulz, LLP
321 West 44th Street, Suite 1000
New York, New York 10036
Tele: 212-850-6102
RStrom@lskslaw.com